

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

COMMODITY FUTURES TRADING  
COMMISSION,

Plaintiff,

v.

TRADERS GLOBAL GROUP INC., et al,

Defendants.

Civil Action No. 3:23-cv-11808-ZNQ-  
TJB

**DECLARATION OF JOSE LINARES  
PURSUANT TO RULE 53(b)(3)**

I, Jose L. Linares, pursuant to 28 U.S.C. § 1746, do hereby declare as follows:

1. I am a partner with the law firm of McCarter English, LLP, with offices located at Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102.

2. Pursuant to Fed. R. Civ. P. 53(a), this Court may appoint me as special master for discovery.

3. In accordance with Fed. R. Civ. P. 53(b)(3) and 28 U.S.C. §455, I make the following disclosures of any potential grounds for disqualification:

a. My law firm, McCarter & English, LLP, represents a witness in a completely unrelated matter wherein the Commodity Futures Trading Commission is investigating another party that is not represented by my firm. McCarter also represents a client who is adverse to the Commodity Futures Trading Commission in a completely unrelated litigation. I have not been personally involved in, nor do I have any knowledge whatsoever, regarding any of these unrelated matters. If appointed, I will be walled off

from those matters. Therefore, I submit that my firm's representation in said unrelated matters would have no effect on my ability to serve as a neutral Special Master.

b. In the past, Quinn Emanuel Urquhart & Sullivan, LLP retained me on behalf of one of their clients to serve as a Mock Trial Judge in a matter completely unrelated to this case. That matter has been completed and is now closed.

c. It is possible that through time I may have become acquainted with some of the attorneys or parties in the instant litigation as a result of my time as a judge of the United States District Court for the District of New Jersey and the Superior Court of New Jersey, Essex County, my involvement with various bar associations and other social affiliations within the New Jersey legal community, or as panelist, co panelist, or attendee at different bar-related CLE programs.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 26<sup>th</sup> day of October, 2023.

*s/Jose L. Linares*  
Jose L. Linares